REMARKS

Claims 1-2, 4-5 and 7-24 stand in this application. Claims 1, 10, 16 and 22 have been amended. Claims 3 and 6 have been canceled without prejudice. No new matter has been added. Favorable reconsideration and allowance of the standing claims are respectfully requested.

Although Applicant disagrees with the broad grounds of rejection set forth in the Office Action, Applicant has amended independent claims 1, 10, 16 and 22 in order to facilitate prosecution on the merits. Applicant submits that the amendments merely clarify, either expressly or impliedly, what was already present in the claims. Furthermore, Applicant submits that the amendments are not narrowing amendments and are not being made for reasons substantially related to patentability.

SPECIFICATION

In the specification, the title and abstract have been amended as requested.

CLAIM REJECTIONS – 35 U.S.C. § 102(b)

At page 3, paragraph 7 of the Office Action claims 1-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent Number (USPN) 5,212,777 ("Gove"). Applicant respectfully traverses the rejection, and requests reconsideration and withdrawal of the anticipation rejection.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102(b), the cited reference must teach every element of the claim. *See* MPEP § 2131, for

example. Applicant submits that the Gove reference fails to teach each and every

element recited in claims 1-2, 4-5 and 7-24 and thus they define over the Gove reference.

For example, with respect to claim 1, the Gove reference fails to teach, among other

things, the following language:

> a switch to connect said control units to said data paths,
> said switch to receive configuration information to
> establish a first set of connections between said control
> units and said data paths to execute a first process using
> single instruction multiple data processing, and a second set
> of connections between said control units and said data
> paths to execute a second process using multiple instruction
> multiple data processing; wherein said first process and
> said second process may be performed substantially in
> parallel.

According to the Office Action, this language is disclosed by the Gove reference at

column 1, line 47 to column 3, line 20; column 5, lines 20-56; column 6, lines 6-43;

column 7, lines 5-13; column 8, line 42 to column 9, line 13; column 16, lines 6-17;

column 61, line 60 to column 62, line 24; Figure 1; Figure 2; Figure 4; Figure 14; Figure

15; Figure 17; Figure 61; and Figure 62. Applicant respectfully disagrees.

Applicant respectfully submits that the Gove reference fails to teach a first

process (e.g. SIMD) and a second process (e.g. MIMD) being performed substantially in

parallel. Rather, the Gove reference teaches a "multilink, multi-bus crossbar switch

between the individual processors and the individual memories" that "allows the system

to perform in both the SIMD and MIMD modes." Gove at column 3, lines 57-61. The

Gove reference, however, does not teach performing the SIMD and MIMD modes

substantially in parallel.

The Gove reference, at column 6, lines 6-22, teaches that "the system can operate in several operating modes, one of these modes being a single instruction multiple date (SIMD) mode…. The second operational mode is the multiple instruction, multiple data mode (MIMD)…. **the system can easily switch between operational modes periodically** when necessary to operate the different algorithms of the different instruction streams." Applicant respectfully submits that the Gove reference arguably teaches a system that can "switch between operational modes" as necessary, however, the Gove reference fails to teach, suggest or disclose a system wherein the different operational modes can be performed substantially in parallel. Consequently, the Gove reference fails to disclose all the elements or features of the claimed subject matter. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to claim 1. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 2, 4-5 and 7-8 which depend from claim 1 and, therefore, contain additional features that further distinguish these claims from the Gove reference.

Claims 10, 16 and 22 recite features similar to those recited in claim 1. Therefore, for reasons analogous to those presented with respect to claim 1, Applicant respectfully submits that claims 10, 16 and 22, and all claims directly or indirectly depending therefrom, are not anticipated and are patentable over the Gove reference. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to these claims.
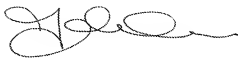
It is believed that claims 1-2, 4-5 and 7-24 are in allowable form. Accordingly, a

timely Notice of Allowance to this effect is earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if

such contact would further the examination of the present patent application.

Respectfully submitted,

KACVINSKY LLC

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John F. Kacvinsky, Reg. No. 40,040
Under 37 CFR 1.34(a)

Dated: <u>January 8, 2007</u>

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